



Project Information Document/ Integrated Safeguards Data Sheet (PID/ISDS)

Concept Stage | Date Prepared/Updated: 23-Mar-2018 | Report No: PIDISDSC24182



BASIC INFORMATION

A. Basic Project Data

Country Mali	Project ID P166796	Parent Project ID (if any)	Project Name Mali Electricity Sector Improvement Project (MESIP) (P166796)
Region AFRICA	Estimated Appraisal Date Jun 04, 2018	Estimated Board Date Sep 25, 2018	Practice Area (Lead) Energy & Extractives
Financing Instrument Investment Project Financing	Borrower(s) Ministère de l'Energie et de l'Eau	Implementing Agency Energie du Mali - S.A	

Proposed Development Objective(s)

The Program Development Objective (PDO) is to improve EDM-S.A. operational performances; expand electricity access in selected areas;

Financing (in USD Million)

SUMMARY

Total Project Cost	60.00
Total Financing	60.00
Financing Gap	0.00

DETAILS

Total World Bank Group Financing	60.00
World Bank Lending	60.00

Environmental Assessment Category

B-Partial Assessment

Concept Review Decision

Track II-The review did authorize the preparation to continue



Other Decision (as needed)

B. Introduction and Context

Country Context

1. Mali is currently recovering from a complex crisis, which affected the country on three fronts: conflict and insecurity in the north, institutional and political tension in the south, and humanitarian and food insecurity across the country due to the 2011 drought. In early 2012, the vast northern regions fell under the control of extremist forces, while a coup in Bamako threw the country into political instability. This eroded the base of Mali's economy and society, including the ability of the Government of Mali (GoM) to provide basic services for the population. Presidential election held in 2013, allowed to reduce political instability in the south. A peace agreement between the GoM and the 'Platform and Coordination Groups in the North' was signed in May and June 2015, with the international community represented in the Peace Agreement Oversight Committee.

2. By 2014, economic growth had reached pre-crisis levels, indicating that the economy was catching up and recovering from the crisis. In 2012, the gross domestic product (GDP) growth dropped to -0.8 percent because of the combined effects of a deteriorating business climate and a drop in official development assistance. With the progressive consolidation of political stability and improved security conditions in 2013, growth resumed at 2.3 percent and accelerated to 7 percent in 2014, its highest level since 2003 (when it was 7.6 percent). Economic recovery continued in 2017 with a 5.3 percent growth rate. Mali's current macroeconomic outlook is positive, with growth projected to be around 5 percent annually over the next two years, provided the security situation does not deteriorate and favorable climatic conditions continue to prevail.

3. Despite the positive macroeconomic progress, Mali remains one of the poorest countries in the world, with an annual per capita GDP of US\$780.51 (2016), and the security condition has recently deteriorated further with spreading of insecurity in the center. The economic slowdown following the security and political crises in 2012–2013 led to a 0.6 percentage point rise in the extreme poverty rate to 46.9 percent in 2013. More recently, exceptional agricultural output growth in 2014 and tertiary expansion in 2015 led to strong GDP per capita growth, and poverty declined to 44.8 percent in 2016. Despite these gains, Mali ranked 179 out of 188 countries on the 2015 Human Development Index, with life expectancy as low as 57 years, adult literacy at 33 percent, and high levels of malnutrition (28 percent of children under five years are stunted).

4. Mali remains fragile and continues to face profound challenges, including meeting a large infrastructure financing gap. The crisis has had dramatic effects on public infrastructure and services with reduced human mobility, limited access to basic services such as health, education and electricity in the conflict affected areas.

Sectoral and Institutional Context

5. Despite significant progress over the last decade, access to modern energy services in Mali remains low, particularly in rural areas. The electricity access rate in 2016, is about 39 percent nationally (compared to 64 percent in Senegal, 55 percent in Cote d'Ivoire and 26 percent in Guinea for example), corresponding to an access rate of 93 percent in urban areas and 19 percent in rural areas. Households still mainly rely on fuelwood for cooking, and wicks and kerosene lamps for lighting. The use of these traditional fuels poses both health and environmental hazards while requiring time-



consuming foraging by women and children, and providing inadequate levels of service.

6. Within the perimeter of its concession, the vertically integrated Malian electricity utility (*Energie du Mali S.A*, EDM) has monopoly over power transmission and distribution, while generation is open to the private sector. EDM is therefore the single buyer for power supplied by independent power producers (IPPs). The Malian Rural Electrification Agency (*Agence Malienne pour le Développement de l'Energie Domestique et l'Électrification Rurale*, AMADER), created in 2003, supplies electricity to rural areas through a public-private partnership (PPP) approach, whereby rural electrification concessions are granted to private operators. The Regulatory Agency for Electricity and Water (*Commission de Régulation de l'Electricité et de l'Eau*, CREE), reporting to the Prime Minister's Office, was established in 2000 to regulate the water and electricity sectors. CREE's mandate is to protect customers, promote competition when possible, arbitrate disputes between the GoM and operators, and approve adjustments to ensure fully cost reflective tariffs. However, its actual role in the sector has been limited due to the Government's interference, for example, through direct negotiations with private operators and proposed tariff adjustment reversals. Furthermore, CREE's mandate is limited to EDM's concession perimeter.

7. EDM's customer base has increased rapidly, from 120,000 households to close to 400,000 in the past 12 years, with demand growing at a compounded annual growth rate of 10 percent over the same period. Weak planning and implementation capacity, limited public resources, lack of experience dealing with private sector investors, and lack of private sector interest have resulted in the GoM reliance on expensive emergency diesel rentals, to meet fast growing electricity demand. The average cost of electricity service to the end users in 2016, is estimated at US\$0.25 per kWh, more than the double of the worldwide average of approximately US\$0.10 per kWh. The electricity tariff stands at US\$ 0.16 per kWh on average and is not cost reflective. Despite that, the tariff is considered high for the average Malian household and businesses whose competitiveness is undermined.

8. Total domestic installed generation capacity connected to the grid stands at 479 MW, although in 2016 only about 250 MW was available mainly due to lack of maintenance of existing generation facilities. Additionally, isolated remote areas located far away from the grid are supplied with diesel generation powered mini-grids, with a total installed capacity of 57 MW. Of the total installed capacity, the energy mix is as follows: 36 % hydro; 30 % thermal; 21 % imports; 11 % off-grid mainly thermal. The total emergency diesel rentals have reached an aggregated installed capacity of 98 MW in 2016 (28 percent of grid-connected available capacity, including the capacity of rentals).¹ Three new solar generation IPPs for a total capacity of 133 MWp are currently under preparation and will help to increase the generation capacity to lower the cost the energy mix. Despite these efforts, system outages have increased in recent years in both frequency and duration. Moreover, the total losses (including technical and commercial losses) increased from 19.6 percent in 2011 to close to 21.9 percent in 2016, mainly due to aging overloaded equipment, and weak customer management capacity. Therefore, the unreliable and expensive existing generation facilities, the delays in the installation of new generation capacities, the limited investments in the transmission and distribution network, added to the high demand growth have contributed to the degradation the quality of service and the high costs of service.

9. The financial situation of EDM has been undermined by high generation costs as well as high technical and commercial losses. With an average cost of service reaching US\$0.23 per kWh and an average pre-subsidy revenue at US\$ 0.176 per kWh in 2016, EDM was losing US\$0.06 per kWh, translating into a total loss of US\$100 million in 2016. EDM received a total subsidy amounting to US\$45.5 million in 2016, translating into a subsidy of US\$ 0.055 per kWh. Facing increasing liquidity challenges, EDM has been relying heavily on short-term borrowing to meet its obligations and has delayed payments to fuel and power suppliers, including neighboring countries such as Côte d'Ivoire. EDM's profitability

¹ The diesel fuel is imported from the neighboring countries ports by trucks on over 1,800 km. The aggregated cost of the commodity and land transportation is one of the highest in the sub region.



depends upon its ability to reduce its cost of service, improve efficiencies along the value chain, and adjust tariffs.² It is therefore paramount that EDM addresses technical and commercial inefficiencies and the GoM's financial support to the sector will be critical in the short to medium term.

10. To address the challenges in the sector and restore its profitability, EDM has set up a new organizational framework in January 2017 to: (i) reinforce the fight against electricity theft through the creation of a new internal audit position; (ii) strengthen the strategic planning function by reinforcing the prerogatives of the Studies and Strategic Planning Department; (iii) optimize the procurement of supplies, assets and fuel through the creation of a Procurement Department; (iv) strengthen the information/data security and management systems through the creation of an Information System Department; and (v) improve the level of revenue collection through the establishment of a dedicated department. In addition, the GoM and EDM have decided to stop relying on emergency power to meet the growing demand and have phased out the rental diesel rentals. Finally, EDM has developed an emergency program (*Le Programme d'Urgences Sociales d'Accès à l'Énergie 2017-2020*), which is in implementation since January 2017. The objective of the program is to improve the quality of the electricity supply and subsequently to increase the access to electricity in urban and rural areas in Mali. The activities envisaged in the program are; (i) the rehabilitation several power plants, including Sirakoro (56 MW), Balingue (33 MW), Sélingué (49 MW) and Sotuba (6 MW); (ii) the rehabilitation and the upgrade of the transmission and distribution system; (iii) the improvement of the billing and revenue collection; and (iv) the increase of the capacity of the existing interconnections with Cote d'Ivoire (from 40 to 75 MW) and Senegal and Mauritania (from 20 to 60 MW).

11. The implementation of the emergency program has already achieved the following results; (i) FCFA 34 billion (approximately equivalent to US\$ 56 million) revenue collected from overdue electricity bills issued before January 1 2017, representing 58% of overdue bills; (ii) a bill collection rate of 72% for bills issued after 01 January 2017, compared to 54% a year ago; (iii) the securitization of illegal connections generating FCFA 800 million (approximately equivalent to USD 1.2 million). Furthermore, EDM has signed a contract with General Electric for the rehabilitation of the Darsalam power plant (33 MW) and is currently negotiating with Wartsila for the rehabilitation of the generation units of the Sirakoro power plant (56 MW).

12. The financing needs of the sector are huge and only a strong partnership with the donors and the private sector can allow the GoM to meet these needs. In addition to the investments needed for power generation, mostly driven by the private sector, the transmission segment, will need US\$ 1.4 billion by 2034 per the Masterplan³. In addition, an average of US\$27 million per year of investments will be needed in the distribution network to deliver reliable and quality electricity to the growing number of customers.

13. The World Bank Group (WBG) is deploying a range of instruments to support the energy sector in Mali, including Development Policy Operations (DPO) and investment project financing. The current DPO includes prior actions for the energy sector related to the improvement of the management and the efficiency of the energy utility. The ongoing IDA-funded Mali Energy Support Project (P108440), which aims to improve the access and efficiency of electricity services in Bamako and other targeted (grid-connected) areas in the country, is expected to close by end June 2018, with most of the major components already completed. The Rural Electrification Hybrid System Project (P131084) under implementation aims to expand access to modern energy services in rural areas, and to increase renewable energy generation in selected areas. In addition, two regional projects involving Mali are also under preparation (i) to connect 100,000 households to the grid from regional substations and (ii) to promote off-grid access through Solar PV systems. In terms of analytic work,

² There has been no substantial tariff adjustment since 2004, with only very limited increases in 2009 and 2014.

³ *Étude de la demande et du plan directeur d'investissements optimaux pour le secteur de l'électricité au Mali*, Artelia Eau and Environnement, March 2015



the Bank is providing a PPIAF (Public-Private Infrastructure Advisory Facility) grant to the GoM to support the private sector participation in the energy sector in Mali. An ESMAP grant will also support the GoM to conduct a tariff and cross subsidy study. Finally, a GIF (Global Infrastructure Facility) operation is under preparation to provide support to the development of hydro connected Solar Generation systems in Mali.

Relationship to CPF

14. The development of energy infrastructure represents a key component of the GoM's strategy to support economic development. The Project is fully consistent with the World Bank Group's FY16–19 Country Partnership Framework (CPF) for Mali.⁴ The CPF lays out three GoM objectives to which World Bank Group interventions are expected to contribute by (a) improving governance, (b) creating economic opportunities, and (c) building resilience. The proposed project will directly support the second area of focus of the CPF by contributing to the provision of affordable, reliable, and sustainable energy supply as an enabler to economic development with the objective to end poverty and promote shared prosperity. A comprehensive program has been proposed for the first two years of the CPF which includes knowledge activities and DPOs to address the binding constraints to poverty reduction identified in the July 2015 Systematic Country Diagnostic.⁵ The program is also expected to address the main drivers of Mali's fragility: weak governance, climate change, and demographic growth.

15. The proposed project is also aligned with the growth pillar of the World Bank's Africa Strategy and will contribute to the supply of reliable and affordable energy for growth. It is anchored in a strong sector dialogue with the Malian authorities and fits with the GoM's strategic objective of improving the performance of its energy sector (including EDM's technical and commercial performance) to meet growing electricity demand in a sustainable manner.

C. Proposed Development Objective(s)

The Program Development Objective (PDO) is to improve EDM-S.A. operational performances; expand electricity access in selected areas;

Key Results

Progress toward achieving the PDO will be measured by the following project outcome indicators:

- System loss reduction (percentage);
- Billing collection rate (percentage)
- People provided with new or improved electricity service (number) (Corporate Results Indicator), of which women (%).

Intermediate indicators

- People provided with access to electricity services under the project by household connections (grid or off-grid) (number), of which women (%).
- Distribution lines constructed or rehabilitated under the project (km).
- Distribution transformer stations installed or rehabilitated under the project (number).
- Outages per year in the project areas (number).
- Least Cost Development Plan (yes/no)

⁴ Report No. 94005-ML.

⁵ Report No. 94191-ML.



D. Concept Description

1. Description

16. The proposed project is the follow up of the Mali Energy Support Project (P108440) which is ongoing and will be closed on June 30, 2018. The project will build on the studies prepared by EDM and lessons learned from the past projects, and will also complement the development objectives of the Mali Rural Electrification Hybrid System Project (P131084). The project will address the utility reform, management improvement challenges and support the Government in sector planning through a programmatic approach to prepare and pave the way for a future program for result project. Therefore, the following activities will be supported; (i) the establishment of a sector planning framework based on a programmatic approach, and the strengthening of the stakeholder's capacities to design a manage a program for result operation and (ii) the rehabilitation, the reinforcement, and the expansion of the transmission and distribution network in Bamako to reduce technical and commercial losses, improve the quality of supply, and increase access to electricity services.

Project Components

Component 1: Transmission and Distribution Improvement and Expansion (US\$ 54 million)

17. The rapid growth of the demand has overloaded the transmission and distribution network in Bamako. The transformers are overloaded in key substations and the networks itself is congested because its limited transit capacity and flexibility. Thus, the technical losses are high and the reliability of the system is weak. This component is designed to improve and expand the transmission and distribution network to address the congestion problem and increase its capacity to meet the growing demand. The activities envisaged include (i) the Rehabilitation and the Upgrade of the HV (High Voltage)/MV Substations and the MV (Medium Voltage) network, and (ii) the Expansion of the MV and the LV (Low Voltage) network to connect 25, 000 new connections.

Subcomponent 1.1: Rehabilitation and Upgrade of the HV/MV Substations and the MV Network (US\$ 30 million equivalent).

18. In this subcomponent, the substations receiving the electricity supply from the Côte d'Ivoire-Mali interconnection, the Selingue Hydropower Plant, and other Thermal plant in Bamako, will be rehabilitated and reinforced. The rehabilitation will consist in the replacement of obsolete critical substation equipment such as breakers, switches, auxiliaries and power supplies, protection and control equipment. Where necessary, civil works will be performed to secure the equipment and the operators. To upgrade the system, higher capacity transformers and capacity banks will be installed with the objective of increasing the transit capacity and reduce technical losses. To increase the transit capacity in the 63-kV system, higher capacity cables will be installed in place of the existing cables in selected portions of the network.

Subcomponent 1.2: Expansion of the Network and connection of new households (US\$ 24 million equivalent).

19. This activity is focused on the construction of new distribution infrastructures such as substations, MV feeders, MV/LV transformer stations, LV lines, and the connection of new households. The construction of a new 30/15 kV substations is envisaged in areas where the load has increased significantly with objective to bring the supply closer to the consumers and reduce technical losses. New feeders will be installed to integrate the new substations into the existing system and ensure redundancy, thus increasing the reliability. Feeders will also be installed to supply new consumers in the peri-urban areas of Bamako. To increase the number of new consumers, new MV/LV transformer stations, LV lines



will be installed and 25,000 new connection equipment (including prepayment meters) will be acquired and installed. Knowing that the high connection fee is a barrier for new consumers, it is envisaged that the new consumers will pay upfront only 20 percent of the connection and the balance will be spread over at least 12 months on their electricity bills.

Component 2- Utility Reform, Capacity Strengthening and Technical Assistance to EDM and the Ministry of Energy (US\$ 3 million)

20. The activities of this component will support the implementation of the EDM's reform currently under preparation, strengthen its capacity in planning, project preparation and project implementation, including public-private partnership advisory and preparation. The technical assistance will support the preparation of a future program for result (PfoR) project in helping the Ministry of Energy (Directorate of Energy) and EDM to prepare pluriannual programs for power expansion comprising generation, transmission, distribution and access in urban and rural areas.

Subcomponent 2.1: Utility Reform and Capacity Strengthening (US\$ 2 million)

21. This subcomponent will support the activities related to the implementation of the reform of the EDM, the preparation of and the implementation of a Management Improvement Plan (MIP), the preparation of a human resource audit of EDM, as well as, the implementation of the key recommendations of the audit. Also under this component, EDM will be equipped with tools (planning and design software, operation and maintenance software), equipment (underground fault detection vehicles and tools, security and operation/maintenance equipment) and logistics (4X4 vehicles for the operation/maintenance, heavy load trucks equipped with cranes) to improve the planning and the operation/maintenance of the network. The MIP will determine government's strategy to improve billing collection rates from 72 % to 92 % or more (92 % is deemed achievable in countries in Sub-Saharan Africa).

Subcomponent 2.2: Technical assistance (US\$ 1 million)

22. Under this subcomponent, consulting firms will be recruited to help EDM to prepare pluriannual programs for a future PfoR operation. For the activities selected for the first five years, the consultant firms will help EDM to prepare the technical studies and the environmental and social safeguard studies.

Component 3 - Operational support (US\$ 3 million)

23. This component will support the project management unit for the duration of the project. Operational services and goods to be funded would include: (a) the recruitment of fiduciary, safeguard, and engineering staff; (b) oversight of implementation of the environmental and safeguards instruments for the investments; (c) external auditing; (iv) training; (v) office supplies and vehicles for project supervision; and (d) part-time consultants as needed. The component will also reinforce the participation of the project beneficiaries during project implementation and beyond. Specific activities to be financed include: (i) communication and consultation with direct beneficiaries, (ii) community monitoring thru the deployment of an ICT based solution including training of actors; and (iii) costs related to grievance redress mechanism.

Component 4 - Contingent emergency response (US\$0)

24. This component, known as the Contingent Emergency Response Component (CERC), will be available should the need arise to redirect some of the project resources to contribute with other projects in the Mali portfolio to respond to an emergency. The available resources would be made available to finance emergency response activities and to address crisis and emergency needs. An Immediate Response Mechanism Coordinating Agency and expenditure management procedures will be defined in an Immediate Response Mechanism Operational Manual (IRM/OM), to be prepared separately and approved by the World Bank, in line with guidance provided under the IPF Policy. In case this component is used, the project will be restructured to allocate financing, revise the PDO and indicators, and detail implementation arrangements.



SAFEGUARDS

A. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The project activities will be located within Bamako region. The environmental and social risks and impacts will be local and limited as the project activities will be limited to the targeted substations or transmission lines on which the right of way is known. Most of the substations are already located in the secured areas belonging to EDM (Government).

B. Borrower’s Institutional Capacity for Safeguard Policies

The preliminary borrower's institutional capacity for safeguards policies found that , at national level, Mali has a legislative and regulatory framework which is conducive to good environmental and social management. Mali has signed a number of international treaties and conventions and has experience with the Bank’s Safeguard Policies due to Bank-funded projects across different sectors. However, implementation capacity remains limited. Environmental policies and their compliance are governed by the Ministry of Environment, Sanitation and Sustainable Development through The National Directorate of Sanitation, Pollution and Noises Control “Direction Nationale de l’Assainissement et du Contrôle des Pollutions et des Nuisance” (DNACPN). The DNACPN is responsible for safeguards compliance of all projects in the country. This agency is familiar with the World Bank safeguard instruments such as the Environmental and Social Management Framework (ESMF), Environmental Impacts Assessments (ESIA) and Environmental and Social management Plans (ESMPs), the Resettlement Policy Framework (RPF) and Resettlement Action Plans (RAPs). However DNACPN is understaffed and has limited capacity. Despite several donor-funded capacity building initiatives, DNACPN is still largely relying on donor funds projects to carry out its field supervision duties. DNACPN has deconcentrated Units named DRACPN that are in charge to review and validate Environmental and Social Notices. These regional bodies often do not have the equipment necessary to monitor social and environmental impacts, their staff lacks training, and management capacity is very thin. The EA archives system of DNACPN remains weak and is mainly manual.

At the level of Ministry of the Ministry of Energy, the capacity remains also weak despite their experience in implementing several World Bank funded projects. Electricité du Mali (EDM) who will implement the project has within one of its technical directorate (Direction des Etudes et Planification Stratégique) an Health Safety and Environment Department. This department hosts at the time of the assessment four staffs with more safety profile. The environment profile staff was under recruitment. The structure lacks social development staff that feed with WB requirement. It was agreed that a Project Implementing Unit will be set up under EDM General Manager office. This Unit will be staffed with at least two skilled safeguards Specialists (Env and Social).

C. Environmental and Social Safeguards Specialists on the Team

Emeran Serge M. Menang Evouna, Environmental Safeguards Specialist
Mahamadou Ahmadou Maiga, Social Safeguards Specialist

D. Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
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Environmental Assessment OP/BP 4.01	Yes	<p>The policy is triggered as the project envisaged to support (i) the Rehabilitation and the Upgrade of the HV (High Voltage)/MV Substations and the MV (Medium Voltage) network, and (ii) the Expansion of the MV and the LV (Low Voltage) network to connect 25, 000 new connections through its component 1 - Transmission and Distribution Improvement and Expansion-. all these activities will generate adverse risks and impacts that need to be addressed. Specific ESIA and or Environmental and Social Notice for the known sites will be prepared, reviewed and disclosed in Mali and at the World Bank Website prior project appraisal.</p> <p>The ESIA or Environmental and Social Notice of the substations will assess PCBs presence and if identified, relevant management and disposal measures will be proposed in the ESMPs.</p>
Natural Habitats OP/BP 4.04	No	The project will not take place in or near natural habitats.
Forests OP/BP 4.36	No	The project activities will not involve forest conversion nor large-scale reforestation or afforestation.
Pest Management OP 4.09	No	The project activities will not involve use or procurement of chemical. Nevertheless, The ESIA or Environmental and Social Notice of the substations will assess PCBs presence and if identified, relevant management and disposal measures will be proposed in the ESMPs.
Physical Cultural Resources OP/BP 4.11	Yes	Although no evidence of significant physical cultural resources or sacred sites/resources in the project intervention area can be certified, some civil works (e.g. construction/rehabilitation) may reveal uncovered artifacts since the country is covering ancient kingdom areas. The chance find procedure is recommended in any civil work contract to be signed under the project. The ESIA or Environmental and social Notice will propose relevant mitigation measures in case of "chance finds" cases.
Indigenous Peoples OP/BP 4.10	No	No indigenous people in the sense of this Policy are located in the project areas.
Involuntary Resettlement OP/BP 4.12	Yes	This policy is triggered because activities under component 1 may require some land acquisition leading to the involuntary resettlement of people and/or restrictions of access to resources or livelihoods. As most of the locations are known, a Resettlement Action Plan (RAP) will be prepared



		consulted upon, and disclosed publicly in country and at the World Bank website prior to appraisal.
Safety of Dams OP/BP 4.37	No	This policy is not triggered as the project is not anticipating to build new dam or directly use the existing dams.
Projects on International Waterways OP/BP 7.50	No	This policy is not triggered policy as the project is not anticipating to collect water from Niger river.
Projects in Disputed Areas OP/BP 7.60	No	This policy is not triggered policy as the project is not anticipating to finance activities in the disputed areas as described in this policy.

E. Safeguard Preparation Plan

Tentative target date for preparing the Appraisal Stage PID/ISDS

May 15, 2018

Time frame for launching and completing the safeguard-related studies that may be needed. The specific studies and their timing should be specified in the Appraisal Stage PID/ISDS

The ESIA and RAP ToRs were reviewed. ESIA and RAPs will be prepared and be ready for disclosure by May 15, 2018

CONTACT POINT

World Bank

Franklin Koffi S.W. Gbedey
Senior Energy Specialist

Borrower/Client/Recipient

Ministère de l'Energie et de l'Eau

Implementing Agencies

Energie du Mali - S.A
Dramane Coulibaly
Directeur Général
drcoulibaly@edm-sa.com.ml



FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

APPROVAL

Task Team Leader(s):	Franklin Koffi S.W. Gbedey
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Approved By

Safeguards Advisor:	Maman-Sani Issa	29-Mar-2018
Practice Manager/Manager:	Mustafa Zakir Hussain	02-Apr-2018
Country Director:	Michael Hamaide	04-Apr-2018